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Civil Aviation / Aviation civile
Aircraft Certification Branch / Certification des aéronefs
Regulatory Standards/ Normes réglementaires (AARDH)
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socket # 1999-5461-138

Your file Votre référence

Our file Notre référence

AARD 5009-6-591

May 9th, 2003

Federal Aviation Administration
Continuous Airworthiness Maintenance Division, AFS-300;
Flight Standards Service,
800 Impendence Avenue, S.W., Room 830
Washington, DC 20591
Att: Mr. Frederick Sobeck

DEPT. OF TRANSPORTATION
2003 JUN 18 P 2:35
CPCP/CS

Subject: Draft Advisory Circular 91-56b: Continuing Structural Integrity Program For Airplanes.

Dear Mr. Sobeck,

Federal Register Volume 68, No. 67 dated April 22, 2003 gave notice on the availability of the subject and invited interested persons to submit their comments to the FAA. Transport Canada would like to propose the following comments for your consideration.

Comment 1.

Section 6. SSID Program: Will there be an "extended" design life assigned to aircraft with SSID ?

Comment 2.

Section 6. SSID (f.) Baseline Structure Inspection Program. The scope is now to include all major alterations, or modifications to the baseline structure. Modifications and repairs to be considered, should be limited to those generated by the Type Certificate Holder. Non-TC holder modifications should also be given considerations such as being handled as AMOC to AD.

Comment 3.

Section 7. Mandatory Modification Program. With respect to the statement "cracks must be difficult to detect during regular maintenance", would this be part of the Widespread Fatigue Damage (WFD) evaluation ? Overlap appears to exist between the mandatory modification program and WFD evaluation.

Comment 4.

Section 8. CPCP. Currently CPCPs are subject to AD action, thus they are developed and monitored by their respective TC holders. The draft AC 91-56B indicates that the new batch of CPCP may be made mandatory via Operations Rule. Clarification should be provided to specify if the TC holder or the operator is responsible for the development of the CPCP and their subsequent revisions?

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Comment 5.

Section 9. Repair Assessment Program. Please clarify the TC holder and the operator's role.

Comment 6.

Section 10. Evaluation for WFD. The effects of WFD assessment need to be clarified with respect to the possibility to extend the Design Service Goal.

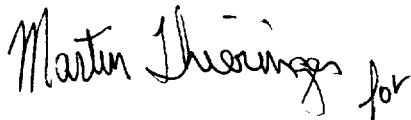
Comment 7.

Appendix 2. Para 2 (e) (1) Period of Evaluation Validity. Does the "projected useful life" has the same meaning as life extension (with the WFD evaluation done and supported by the results of the evaluation).

Comment 8.

Appendix 2. Para (e) (2). The statement "decrease the initial validity period" needs clarification.

Thank you for the opportunity to comment on the Draft Advisory Circular: Continuing Structural Integrity Program For Airplanes.

A handwritten signature in black ink that reads "Martin Shering" followed by a small "for" written below it.

Maher Khouzam
Chief, Regulatory Standards
Aircraft Certification